

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)**

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
110 Allen Rd., Suite 304
Basking Ridge, NJ 07920
(973) 230-2095
DStolz@genovaburns.com
DClarke@genovaburns.com

Local Counsel for the Plan Administrator

In re:

BLOCKFI INC., *et al.*,

Wind-Down Debtors.¹

Case No.: 22-19361

Judge: Hon. Michael B. Kaplan

Chapter: 11

Hearing Date: November 28, 2023

ADJOURNMENT REQUEST

1. I, Donald W. Clarke, Esq.

- ☒ am the attorney for: the Wind-Down Debtors and Plaintiff,
- ☐ am self-represented,

and request an adjournment of the hearings on the following matters for the reason set forth below.

- i. *BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and Imposing Sanctions for Willful Violations of the Automatic Stay and (III) Granting Related Relief* [Docket No. 1330].
- ii. *Letter Brief in Opposition to BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and Imposing Sanctions for Willful Violations of the Automatic Stay and (III) Granting Related Relief* [Docket No. 1495]

¹ The Wind-Down Debtors in these Chapter 11 cases, along with the last four digits of each Wind-Down Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691

iii. Pre-Trial Hearing in Adversary Proceeding No. 23-01175 (MBK).

Current hearing date and time: November 28, 2023, at 10:00 a.m.

New date requested: December 19, 2023, at 10:00 a.m.

Reason for adjournment request: BlockFi International and Vrai Nom have reached an agreement in principle to resolve all pending matters in the adversary proceeding and main bankruptcy case, subject to Court approval. The Parties request an adjournment to December 19, 2023, to permit the Parties time to document and seek Court approval of the settlement agreement. Pursuant to D.N.J. LBR 9013-2(a)(3), Vrai Nom has agreed to allow BlockFi International until December 15, 2023, to file a reply. All other rights of the parties are reserved.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: November 22, 2023

/s/ Donald W. Clarke

Signature

COURT USE ONLY:

The request for adjournment is:

12/19/2023 at 10:00 am

☒ Granted New hearing date: _____ ☐ Peremptory

☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory

☐ Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.